

A&O SHEARMAN

Application GRANTED.

The Clerk of Court is directed
to terminate ECF No. 60.

VIA ECF

Hon. Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Date: July 2, 2024

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July 1, 2024

Re: *United States v. Pablo Hernandez-Rodriguez*, 23-cr-00509-JHR-2

Dear Judge Rearden,

We write on behalf of Defendant Pablo Hernandez-Rodriguez (“Mr. Hernandez”) pursuant to Rule 3.G. of Your Honor’s Individual Rules and Practices in Criminal Cases and the Court’s order dated June 12, 2024 setting the deadline to submit pretrial motions by July 8, 2024. ECF No. 57. Mr. Hernandez respectfully requests a 21-day extension to submit pretrial motions by July 29, 2024 so that his counsel may have sufficient time to continue to review discovery and consult with Mr. Hernandez. As the Court is aware, current counsel was assigned to Mr. Hernandez on May 1, 2024, and since then have worked with Mr. Hernandez’s previous attorney and the Government to receive the discovery in this matter. The protective order between Mr. Hernandez’s current counsel and the Government was entered onto the docket on June 10, 2024. ECF No. 53.

This is Mr. Hernandez’s second request for an extension. The Court previously granted Mr. Hernandez a 21-day extension to file pretrial motions. ECF No. 57. The only other previous extensions in this matter are the ones the Court granted the Government relating to its response to Mr. Hernandez’s bail determination, ECF No. 52, and a 21-day adjournment of the motion schedule for Mr. Guerrero, ECF No. 55. This request would affect the remaining deadlines for pretrial motions as oppositions are currently due July 22, 2024 and replies are currently due July 29, 2024. The extension would move these dates to August 12, 2024 and August 19, 2024 respectively. Mr. Hernandez does not expect this request to interfere with future deadlines as the next deadline is on September 27, 2024 for motions *in limine*, proposed *voir dire*, requests to charge, and proposed verdict forms. ECF No. 34. Mr. Hernandez’s next scheduled appearance before the Court is not until the final pretrial conference on October 18, 2024. *Id.* The Government consents to this request.

Respectfully,

Eugene Ingoglia
Partner

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